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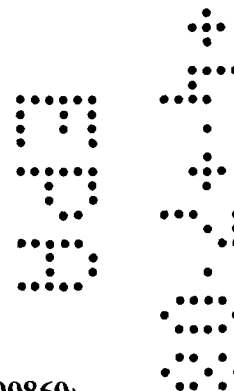
474274-00

**Health & Environmental Horizons, Ltd.**

2851 South Haven Road  
Annapolis, MD 21401  
410-974-6112/301-261-8491

April 3, 2008

Adam Heyward  
Regulatory Management Branch 2 (PM34)  
Antimicrobials Division (7510P)  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460



**SUBJECT: Response to EPA Comments, OPP Decision Number D-390860;**  
Request for Registration of a Manufacturing Use Product (ChitoSante'  
MUP) containing the Active Ingredient (Chitosan) Produced by VA&G  
Bioscience, Inc.; EPA Registration No. 75100-E

Dear Adam;

The attached revised documents are provided in response to Juan Negrón's comments regarding the Product Properties and Product Chemistry data (MRID Nos. 47369601 and 47027604) provided to EPA on March 8, 2008. Specifically, Juan requested the following:

(1) clarification of the purity of chitosan. The original 5 Batch Analysis contained the degree (%) of deacetylation but not the purity of the active ingredient. These analyses have been rerun and now provide the purity of each batch (99.3-99.7). See document number 4, revised April 3, 2008.

(2) clarification regarding the density and pH of the MUP, identified as a solid. This information is now listed on the CSF (revised 4/3/08) and is as follows (See document number 1, revised 4/3/08):

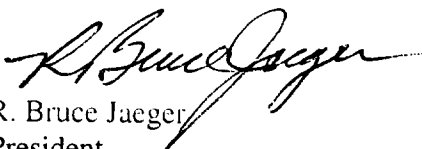
density: 0.80 -1.05 g/cm<sup>3</sup>

pH: 6.5-7.5 (in water) and 4.57 in 1% acetic acid

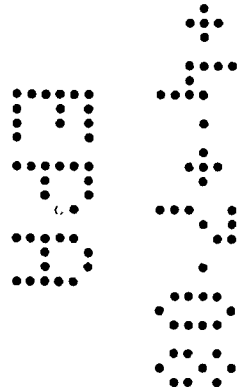
(3) clarification regarding the analytical method for the MUP (a solid material). The Ninhydrin method is the previously approved analytical method for chitosan in solution. However, for the solid form of chitosan please see the reference provided, Analysis of Chitin and Chitosan, pub. 1992, The Macmillan Press, Ltd, ISBN 0-333-52417-9, page 112 (resubmitted herein to facilitate review).

Hopefully, these revised documents and additional information will satisfy Juan's questions and concerns. Once again I wish to express my appreciation to you and your staff for making every effort to facilitate a quick turnaround on the review of this submission. If there is anything else you need please do not hesitate to contact me and I will attempt to resolve your concerns as quickly as possible. Thanks.

Sincerely,

  
R. Bruce Jaeger  
President

Attch: (1) Resubmitted reference, Analysis of Chitin and Chitosan



VOLUME 1 OF 2 OF SUBMISSION  
TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF APPLICANT/SUBMITTER:

Ya Chung Wei  
Chief Executive Officer  
VA & G Bioscience, Inc.  
7, Ding-Hu 7<sup>th</sup> Street, Gueishan  
Taoyuan, Taiwan 333 R.O.C.

U.S. AGENT/REPRESENTATIVE:

R. Bruce Jaeger  
President  
Health & Environmental Horizons, Ltd.  
2851 South Haven Rd.  
Annapolis, MD 21401


REGULATORY ACTION:

Submission of Revised Documents 1 and 4 for EPA Registration Application, 75100-E.

TRANSMITTAL DATE:

April 3, 2008

MRID NUMBER	VOLUME NUMBER	STUDY TITLE	EPA GUIDELINE Number
	1 of 2	Transmittal Document	-
<b>Reject (01)</b>	2 of 2	Document Number 1: Product Identification and Disclosure of Ingredients; Certified Limits	830.1550 830.1750 [Revised]
<b>47427402</b>	2 of 2	Document Number 4: Five Batch Analysis	830.1700 [Revised]

COMPANY OFFICIAL: R. Bruce Jaeger Signature: 

COMPANY NAME: VA & G Bioscience, Inc.

COMPANY CONTACT: R. Bruce Jaeger

AGENT/REPRESENTATIVE: R. Bruce Jaeger